ORIGINAL

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CompTel

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

November 21, 2000

Via Hand Delivery

ORIGINAL

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Presentation in CC Docket No. 98-147

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's rules, the Competitive Telecommunications Association ("CompTel") hereby gives notice that on November 20, 2000, its representative, and representatives its member companies Tachion Networks, Inc. ("Tachion") and Advanced TelCom Group ("ATG") met with Commission staff regarding the above-referenced proceeding. Attending the meeting from the Commission were: Johanna Mikes, William Kehoe, Shanti Gupta, Staci Pies, Alan Thomas David Ward, Paul Marrangoni, and Kathy Farroba.

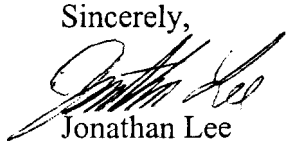
CompTel urged the Commission to adopt a definition of the word "necessary" for purposes of interpreting Section 251(c)(6) of the Act that would allow any equipment to be collocated in the ILEC central office which contributed to, or increased, the "collocation throughput" of a given collocation arrangement. In illustrating this concept, representatives of both Tachion and ATG explained, using physical models of the Tachion Fusion 5000 (a multi-function piece of equipment), how the number of potential customers, and, thus, interconnection traffic, would be expanded with even less space requirements than traditional single function equipment, if CLECs were able to collocate equipment such as this in the ILEC central office.

ATG and Tachion also explained that the demand for scarce ILEC tandem space would also be minimized through placement of multi-function equipment in ILEC end offices. Tachion further explained that whether the equipment had its "full functionality" or only selected capabilities had no effect on the amount of ILEC central office space needed for collocation, as functionality in this equipment is software-driven.

Representing CompTel member Advanced TelCom Group was Kathleen Marshall. Representing Tachion Networks were Lawrence Roberts and Holly Rachel

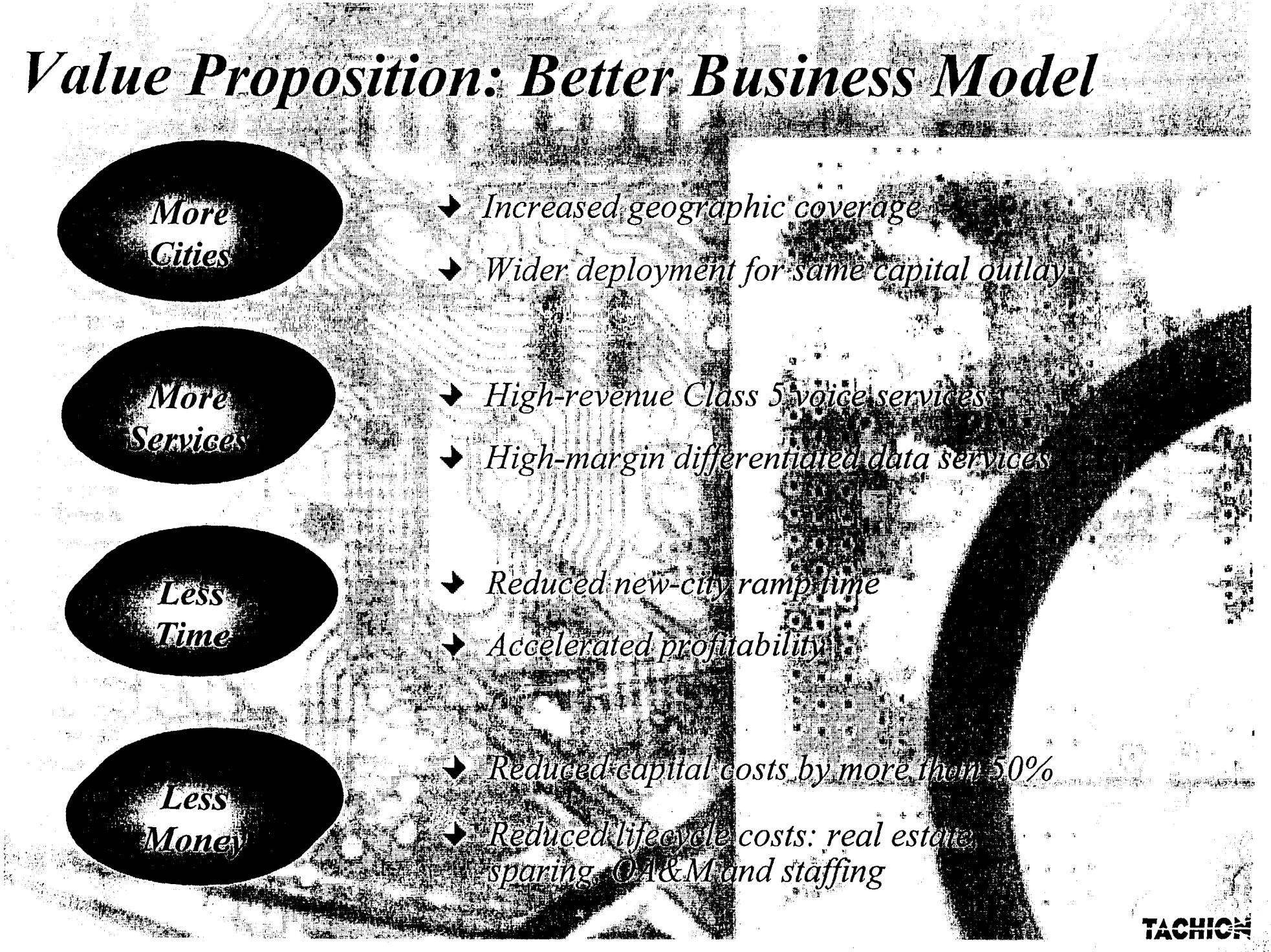
Smith of Davis Wright Tremaine LLP; and Ernest Russo, David Zeckhausen, and Theodore Weitz of Tachion Networks. Representing CompTel was the undersigned attorney. During the meeting, written materials were distributed, copies of which are attached to this letter.

Sincerely,



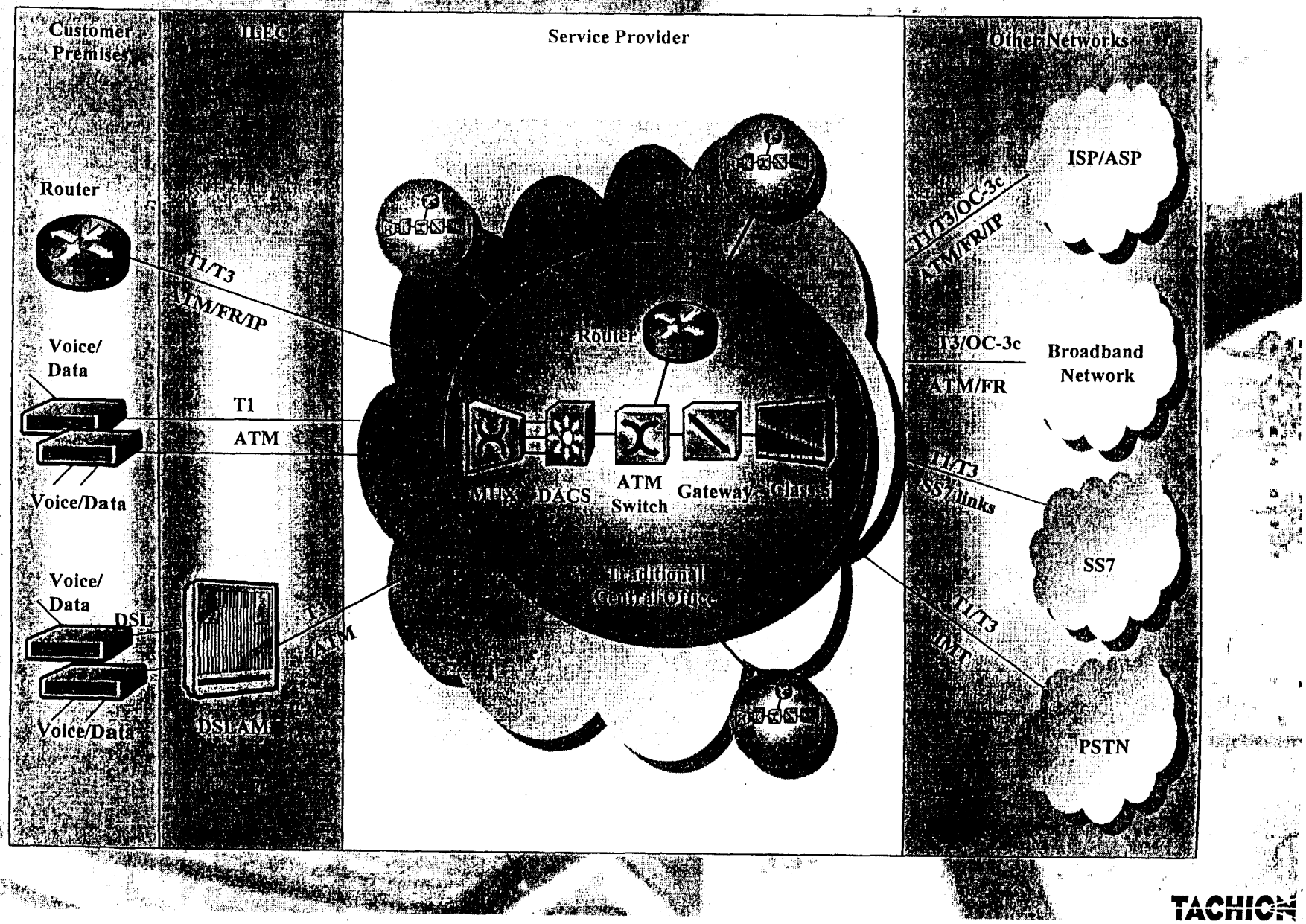
Jonathan Lee
Vice President,
Regulatory Affairs

Value Proposition: Better Business Model



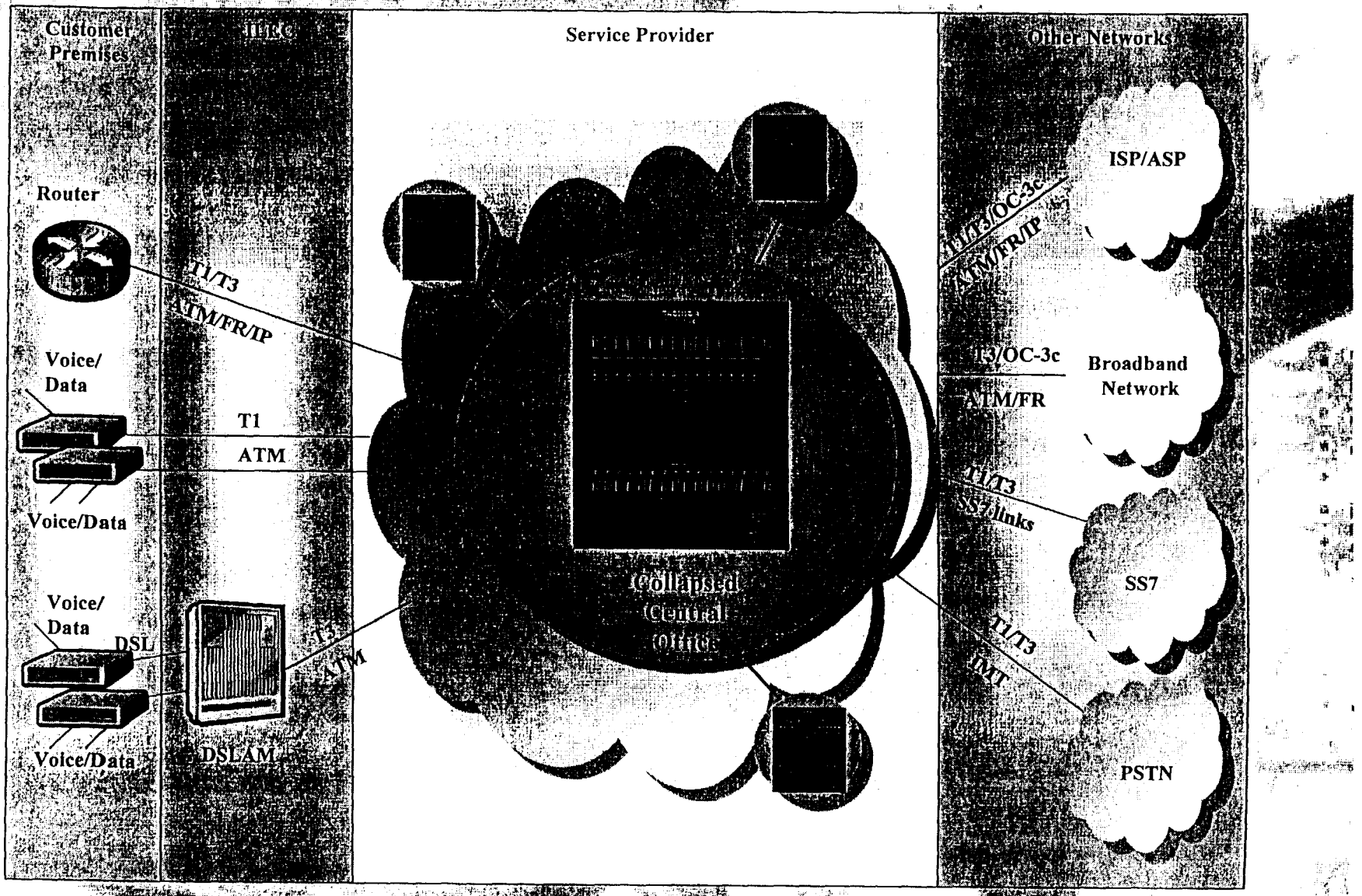
TACHION

Bundled Broadband Services



TACHION

Bundled Broadband Services

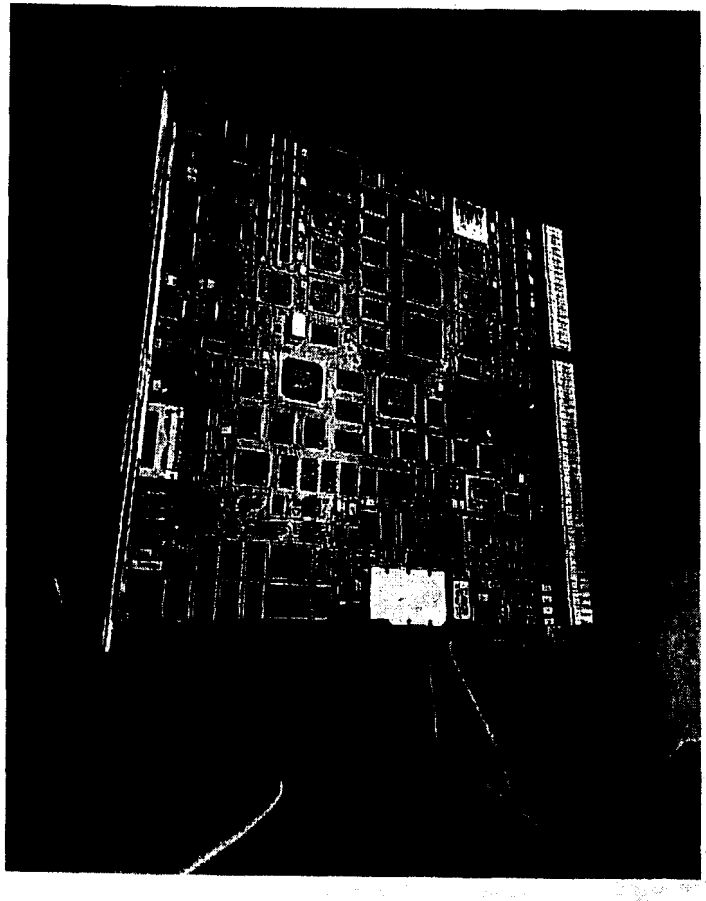


TACHION

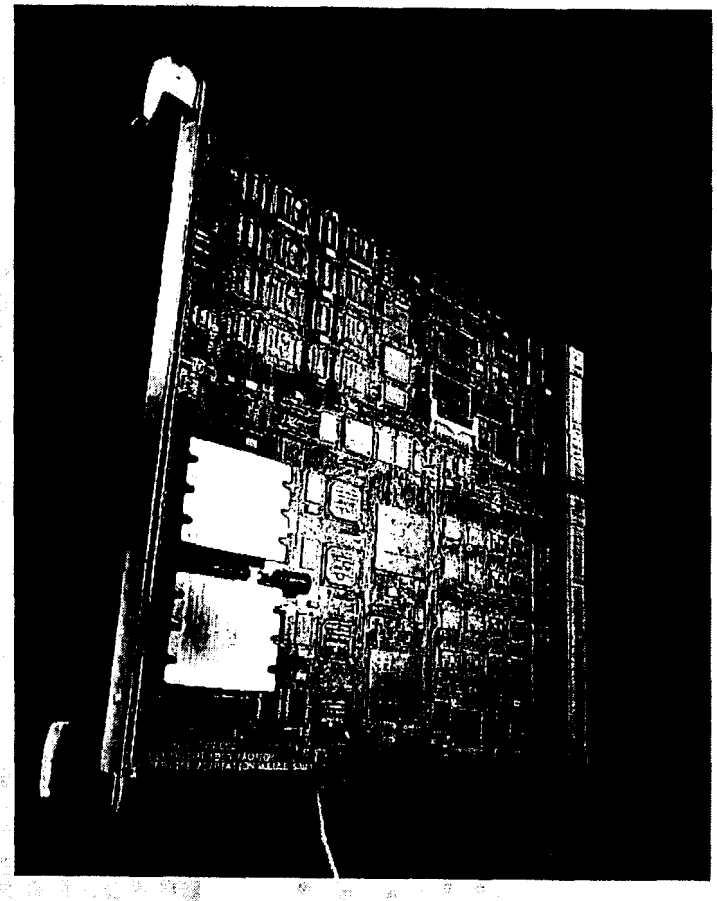
Fusion 5000 Key Capabilities

- ***Enables next-generation business plan***
  - ✓ High-margin service offerings and new revenue streams
    - Data (ATM, FR, IP), Voice (Class 5 functions)
  - ✓ High service margin per square foot
    - Multiple System in a single rack
  - ✓ Opens new markets; improves economics of emerging applications
    - Broadband bundled services: integrates legacy technology
    - Internet Offload: optimizes usage of current switches
  - ✓ Collapsed CO reduces investment, provides integration, increases ROI
    - Integrates transport, switching, routing and signaling
- ***Streamlines OA&M***
  - ✓ One system to manage both voice and data services
  - ✓ Centralized management of multiple switches
  - ✓ Self guiding configuration screens, GUI-based

CO on a Card



Switching & Processing
Module



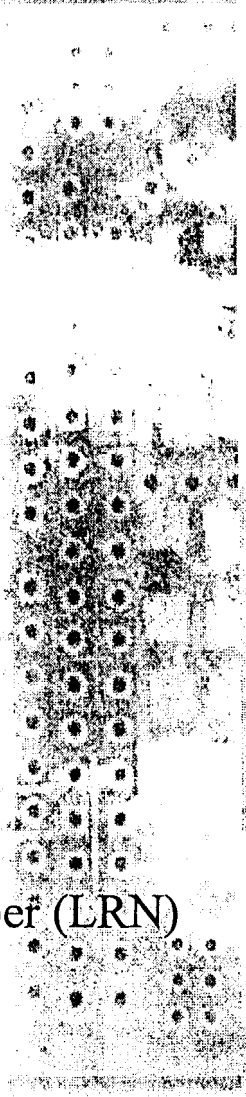
Line card
(Service Adaptation Module)

TACHION

Fusion 5000 Feature Summary

- IMT to PRI Internet Offload application support
- Channelized DS3 interface for both PRI and IMT
- NFAS Groups
- Multi-line hunt groups across PRI/NFAS groups
- D-channel backup
- PRI direct connect
- ISUP maintenance
- E911
- Multiple incoming NPAs/NPXs
- Per call CDR records with CDR-to-AMA translation
- Tones & Announcements

(…continued) Fusion 5000 Feature Summary



- Bundled Broadband Service application (Voice & Data)
- Edge Data application
- Supports Frame Relay service
- ATM interfaces (DS3, OC-3, IMA)
- Call processing
  - CLASS capabilities
  - 800 services, both on the switch and SCP-based
  - Multiple call areas, rate centers and PICs support
  - Operator services interfaces
  - Local Number Portability (LNP) / Local Routing Number (LRN)
  - Trunk hunting and routing

(…continued): Fusion 5000 Feature Summary

- Vertical and CLASS Telephony features w/ IAD support
  - Call waiting & cancel call waiting
  - Call forward (busy, variable, no answer, etc.)
  - Hunt groups (least busy, circular, linear, etc.)
  - Three-way calling (subscription, per use)
  - Call transfer
  - Caller ID and Caller ID on Call Waiting
  - Subscription and per call blocking of outgoing name and number
  - Automatic Recall (i.e., *69)
  - Call hold